

PRELIMINARY ADJUSTMENT OF CONSUMER PRODUCTS AND AEROSOL COATINGS DATABASES TO REFLECT THE 2001 SALES YEAR

The California Air Resources Board (ARB) developed a per-company emissions inventory for 2001 using information gathered in our 1997 Consumer Products and 1997 Aerosol Coatings Surveys. This data was adjusted to account for volatile organic compounds (VOC) emission limits taking effect during the interim years. The bullets below highlight the changes made to the database.

- 1997 Consumer and Commercial Products Survey and 1997 Aerosol Coatings Survey used as basis.
- VOC content grown by Department of Finance (DOF) population data from 1997 to 2001 for consumer products database but not for aerosol coatings due to no-growth assumptions.
- All VOC standards that took effect between 1997 and 2001 were credited by lowering the VOC content of products above the limit to exactly meet the limit for their respective categories.
- Products that were within the 3-year sell-through period were also adjusted to meet their respective limits if they appeared to be subject to the standard.
- Products that do not appear to be subject to the VOC standard in a given category and were not in compliance with the limit were not adjusted. These were predominantly specialty products.
- Very few products in the fragrance categories were adjusted since most appeared to be subject to the “grandfather” clause.
- Paint thinners were lumped with the per-company emissions from consumer products since the 1997 Consumer Products Survey is the only survey available of manufacturers of paint thinners.
- Charcoal lighter fluids were assumed to emit 0.02 pounds per start. Their emissions were included in the per-company totals.
- Adhesives and sealants sold in containers larger than 16 ounces that were reported in the 1997 Consumer Products Survey were not included in the per-company totals. These products are regulated by regional or local air agencies.
- The small categories were not included in the per-company totals, since we have no survey other than the 1990 U.S. EPA survey for which to allot the emissions.

- The per-company emissions do not reflect market coverage adjustments. Adjustment factors are not applicable to individual companies.
- Emissions from liquid laundry detergents, hand dishwashing soap and heavy duty hand cleaners were not included. These categories were last surveyed in the 1994/1995 Survey. In addition, the market coverage of the soap categories was poor.
- Cold process roof cements were surveyed in the 1997 Survey but are actually an architectural coatings category. Their emissions are included in the architectural coatings inventory rather than the consumer products inventory.

"Parent" Companies

Many companies that reported separately in the two surveys had their emissions combined if they are believed to be the same company. A list of these "Parent" companies is provided below. We understand that there may be other companies listed that are under common ownership, and will make corrections as information becomes available during the regulatory process.

Results

Attached is a preliminary list that shows the adjusted 2001 VOC emissions of the top 100 companies. Companies that emit over 100 tons per year are listed with total VOC emissions of 65,497 tons per year. Only 57 companies emit over 250 tons per year; their combined emissions are 58,905 tons per year. The VOC emissions from the 57 companies that emit over 250 tons per year represent 82 percent of the 71,582 total tons attributed to individual companies covered by the ARB surveys.

The regulation only affects companies with emissions of 250 tons per year or greater. However, since our data is four years old, we are providing a list of companies with emissions over 100 tons per year to account for potential growth of these lower-emitting companies during the four year period. This growth may have occurred via increases in sales at greater than population growth, development of new products, purchasing of products from other companies, or mergers with other companies. If there is a possibility that your 2001 per-company emissions are actually 250 tons per year or greater in California, or that your company is a division or subsidiary of a larger company, this information should be provided to CARB.

PRELIMINARY LIST OF PARENT COMPANIES

"Parent" Name	Combined Companies
Bristol Myers Squibb Company	Bristol Myers Squibb-Beauty Care-Redmond Product Bristol-Myers Products a Division of BM Squibb Co. Bristol Myers Squibb-Beauty Care-Duart Labs Bristol Myers Squibb-Beauty Care-Claireol Bristol Myers Squibb-Beauty Care-Redmond Bristol Myers Squibb-Beauty Care-Matrix Bristol Myers Squibb Worldwide Beauty Care
Cleaning Technologies Group-Franklin & Mas (Ivax)	Stanley Home Products G - C Lubricant Company Fuller Brush Commercial Products The Fuller Brush Company Cleaning Technologies Group-Franklin & Mas
CWC (Formerly PCCW)	CWC (Formerly PCCW) Huish Detergents Inc.
Franklin International, Inc.	Kahrs Floor Service Louis & Company Franklin International, Inc. H.G. Roane Orco LD Brinkman United McGill Corporation
ICI Paints	Macco Adhesives
Macklanburg-Duncan	L.D. Brinkman Macklanburg-Duncan Victor-Kemp PAFSCO
Maintex Inc.	Maintex Inc. Maintenance Warehouse Smart & Final
RPM INC.	Kop-Coat Inc. Bondo/Mar-Hyde Corp. Chemspec Bondo/Mar-Hyde Corporation DAP Inc Rust-Oleum Corporation The Testor Corporation Mohawk Finishing Products, Inc.

S.C. Johnson & Son Inc.	S.C. Johnson Commercial Markets, Inc. S. C. Johnson and Son, Inc. S.C. Johnson Commercial Markets Inc. Whitmore MicroGen Research Laboratories Inc.
Safer Inc.	SureCo., Inc. Black Leaf Products Co. A Division of SureCo, Inc. Dexol Industries Safer Inc.
Safeway, Inc.	The Vons Companies, Inc. Safeway, Inc.
Shiseido Co., Ltd.	Shiseido Cosmetics (America) Ltd. Zotos International Inc.
State Industrial Products	UZ Engineered Products State Chemical Manufacturing Co Neutron Industries
The Dial Corporation	The Dial Corporation Dial / Freeman Cosmetics Corporation
The Estee Lauder Companies Inc.	Make Up Art Cosmetics AVEDA Corporation
The Valspar Corp.	Valspar Refinish Valspar Corporation
Triangle Pacific Corporation	Robbins Hardwood Flooring, Inc. Hartco Hardwood Flooring L.P. Bruce Hardwood Flooring, L.P.
Unilever	Unilever HPC USA-Helene Curtis Unilever HPC USA-Chesebrough-Ponds

**PRELIMINARY LIST OF
AFFECTED CONSUMER PRODUCTS MANUFACTURERS**

Rank	Company Name	2001 Adjusted VOC Emissions (tons/year)
1	W.M. Barr	5,460
2	S.C. Johnson & Son Inc.	4,201
3	Sherwin Williams Co.	3,771
4	Unilever HPC USA-Helene Curtis	2,739
5	Reckitt Benckiser	2,690
6	Perrigo Company Of Tennessee	2,355
7	RPM, Inc.	2,311
8	Parks Corporation	2,256
9	The Clorox Company	1,898
10	Bristol Myers Squibb Company	1,739
11	The Valvoline Company	1,691
12	Ace Hardware Coporation	1,684
13	Proctor & Gamble	1,446
14	Willert Home Products, Inc.	1,368
15	WD-40	1,260
16	Packaging Service Co., Inc.	1,223
17	The Gillette Company	957
18	Shiseido Company Ltd.	902
19	Zep Manufacturing Company	897
20	Sunnyside Corporation	836
21	3M	822
22	Berryman Products, Inc.	786
23	Lilly Industries	775
24	Meguiar's Inc.	748
25	Penn Champ, Inc.	692
26	Lesco	657
27	Mary Kay Inc.	656
28	Penzoil Products Company	630
29	Monsanto Co.	606
30	ICI Paints	585
31	Radiator Specialty Company	582
32	IPS Corporation	560
33	Sebastian International	514
34	Alberto-Culver USA, Inc.	469
35	American Stores Company	461
36	Wal Mart Stores, Inc.	460

37	Maintex Inc.	452
38	Moc Products Co., Inc.	444
39	United Industries Corp.	441
40	Coty, Inc.	439
41	Faultless Starch/Bon Ami Company	405
42	Triangle Pacific Corporation	404
43	Oatey Company	386
44	CWC (Formerly PCCW)	376
45	Kiwi Brands	364
46	Kar Products	330
47	The Valspar Corp.	327
48	BASF Corporation	317
49	Lamaur Corporation	305
50	Revlon Consumer Products Corp.	304
51	CRC Industries, Inc.	299
52	Safeway, Inc.	286
53	Volkswagen Of America	284
54	Cosmair Inc.	276
55	Parfums de Coeur	272
56	Blue Coral-Slick 50, Ltd.	256
57	Avon Products Inc.	253
	Subtotal 57 Companies >250 tons per year	58,905
58	Tristar Corporation	247
59	The Dial Corporation	246
60	Longs Drug Stores, California, Inc.	243
61	Aervoe Pacific Co.	236
62	Technical Chemical Company	223
63	Waxie's Enterprises, Inc.	214
64	John Paul Mitchell Systems	208
65	Conair Corporation	207
66	K-Mart Corporation	200
67	Franklin International, Inc.	198
68	Turtle Wax, Inc	178
69	Estee Lauder Companies	172
70	Production Car Care Products	172
71	Bix Mfg. Co.	166
72	Safer Inc.	163
73	Certified Grocers of California	162
74	Schering-Plough Healthcare Products	160
75	Ecolab	159
76	First Brands Corporation	151

77	Seymour Of Sycamore	147
78	Personal Care Products	146
79	Albertson's, Inc.	140
80	Carter-Wallace, Inc	139
81	Colgate-Palmolive Company	136
82	Dep Corporation	135
83	Tru*Test Manufacturing	131
84	Mission Kleensweep Products, Inc.	131
85	Cleaning Technologies Group-Franklin & Mas (Ivax)	126
86	Macklanburg-Duncan	123
87	Turco Products Inc	120
88	Masterchem Industries, Inc.	118
89	Loctite Corporation	115
90	Sunshine Makers, Inc.	113
91	Prestone Products Corporation	112
92	Medical Chemical Corp.	112
93	Spartan Chemical Company, Inc	112
94	P&S Sales, Inc.	110
95	Venus Laboratories, Inc.	106
96	Liz Claiborne Cosmetics	105
97	Playtex Products, Inc.	105
98	The Hoover Co.	103
99	Waterbury Companies, Inc.	102
100	Amway Corporation	102
Total 100 Companies > 100 tons per year		65,497